

Accessibility Policy – Employment Standards

Issued: January 1, 2014

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Introduction

The AODA regulation established Standards to address barriers that persons with disabilities face in the areas of information and communications, employment, and transportation. TheMIGroup (the Company) implemented the first part of AODA as it related to providing for providing services to customers. This new policy provides details of the Company's policy and process in accordance with the Government of Ontario's Integrated Accessibility Standards as well as the Standards for Employment. Standards under AODA do not replace or change the Company's obligation under other laws such as the Human Rights Code. Where a Standard sets different rules than existing laws, section 38 of AODA provides that, "provisions that provides the highest level of accessibility for persons with disabilities will apply."

Purpose

To outline to employees the overall policy actions and following process and framework below that TheMIGroup has put in place to improve opportunities for people with disabilities in compliance with the legislation.

Policy Statement Of Commitment

The Company supports the principles of AODA and is committed to creating an inclusive culture organizationally, by preventing and removing barriers for persons with disabilities and ensuring that they are treated with dignity and respect. The Company will also make efforts to accommodate persons with disabilities in a reasonable, timely manner and develop a written process for creating and documenting individual plans for those employees with disabilities.

Policy Application

This policy applies to MI employees, contractors, temporary employee in Ontario, as is appropriate, and to any individual or organization that provides goods, services or facilities on behalf of TheMIGroup, per the requirements of AODA.

General Provisions

1. Accessibility Policies and Plans

TheMIGroup confirms its commitment to make documents regarding accessibility publically available and to provide them in an accessible format upon request.

2. Accessible Formats Of Documents and Communication Supports

Accessible formats and communication supports shall be provided in a reasonable way and in a timely manner taking into account the persons accessibility needs.

3. Multi-Year Accessibility Plan

The Company will develop and maintain a multi-year accessibility plan. This plan will be reviewed and where necessary update the plan at least once every 5 years.

4. Emergency Information

Potential emergencies include, but are not limited to: fire, power outages, severe weather, natural disasters and workplace security incidents. If a person's disability is such that particular emergency response information is necessary, on being made aware, this information shall be developed and provided to the person with the disability. If a fellow employee has volunteered to

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provide assistance to an employee with a disability, any necessary information shall be provided, with the disabled employee's consent, to that volunteer.

When the Company prepares emergency procedures and plans and makes the information available to the public and employees, the information will be available in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Confidentiality

Personal information concerning an individual's disability cannot be released without written consent of the individual. Where the accommodation process requires the release of confidential information to a third party (such as an external provider of services required to support the individual's disability situation), the third party will be required (per MI's existing Privacy Policies) to ensure that confidentiality is protected, that the information obtained is kept in a secure location and used solely for the purpose that that the release was required.

Employment Standard Provisions

The Employment Standard (under AODA) builds upon the existing requirements under the Ontario Human Rights Code (OHRC) in relation to how to accommodate individuals in Ontario with disabilities, throughout the job application process and the employment relationship. It applies in respect to employees and does not apply to volunteers and other non-paid individuals as follows:-

Recruitment:

Individuals will be notified of the availability of Company's commitment to accommodating those with disabilities:-

1. during the recruitment process, when advertising the position and during the screening and face to face interview process.
2. when a selected applicant request accommodation, individual conversations will take place with the candidate in order to provide or arrange for the provision of suitable accommodation that takes into account the individual's disability.
3. during the onboarding process should they be successfully hired.

Employee Support:

TheMIGroup will inform employees of the provisions procedures in place to support them if they have a disability.

1. This information will be reviewed with new employees as soon as is practicable after they begin their employment.
2. Updated information will be provided to all employees whenever there is a change to existing policies on the provision of job accommodation that takes into account an employee's accessibility needs due to disability.

Accessible Formats and Communication Supports for Employees:

Where an employee with a disability requests it, TheMIGroup will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

- Information that is needed in order to perform the employee's job.

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- Information that is generally available to employees in the workplace.

Workplace Emergency Response Accommodation Information:

Where The Company is aware of the need for emergency response accommodation, this information will be provided to the relevant employee. In addition, in the event that an able bodied employee has volunteered to provide assistance to an employee with a disability, pertinent information regarding their particular needs for assistance will be provided to that volunteer, with the disabled employee's consent. This emergency information is to be reviewed should there be a change in the employees work station within the office.

Documented Individual Accommodation Plan IAP):

Documented individual accommodation plans will be developed for employees with disabilities. Where requested these plans can include information regarding accessible document formats and communication support as well as individualized workplace emergency response information.

Return to Work Process

The Company has put in place a documented return to work process to outline the reasonable steps the Company can take to facilitate the accommodation support an employee may need on returning to work with a disability.

Performance Management, Career Development and Redeployment

In accordance with AODA, TheMIGroup shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans when providing career development, performance management and when considering redeployment.

Training Provisions

Training will be provided to Ontario employees on the requirements of Accessibility Standards and on the Ontario Human Rights Code (OHRC) as it pertains to persons with disabilities. Revised training will also be provided where there are any changes to the legislation, this policy procedures and practices.

Additionally, training will be provided on the provisions of this policy to:

- a) Employees, during their new hire orientation program through a variety of methods, including but limited to; new hire orientation, via email, or other company information sharing programs as appropriate.
- b) Providers who deliver Goods/Services in Ontario on behalf of TheMIGroup who are required to comply with this legislation. Providers with 20 or more employees will also be asked to acknowledge their understanding of the legislation and their obligations in terms of service delivery in order to comply with its provisions.

Record of Training:

TheMIGroup will keep a record of training provided to employees, that includes training dates and number of attendees.

COMPLIANCE

All employees are responsible for ensuring they act accordance with this policy in carrying out their roles, as appropriate to their position and where applicable. None compliance with this policy may lead to disciplinary action up to and including dismissal.

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APPENDIX 1

Definition of Terms used.

“**Disability**” covers a broad range and degree of conditions, some visible and some not visible. A disability may have been present from birth, caused by an accident, or developed over time. There are physical, mental and learning disabilities, mental disorders, hearing or vision disabilities, epilepsy, drug and alcohol dependencies, environmental sensitivities, and other conditions.

The term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;

- a condition of mental impairment or a developmental disability;
- a learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder; or
- an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

Barrier: anything that prevents a person with a disability from fully participating in one or more aspects of society including a physical barrier, an architectural barrier, information or communications barrier, technological barrier, policy or practice.

Standard: according to the AODA, sets out what a person or organization must do to achieve accessibility for persons with disabilities to who the standard applies.

Accessible formats: may include, but are not limited to large print, recorded audio and electronic format, braille and other formats usable by persons with disabilities.

Training: any process used to provide inform and record the information provided to persons, regarding this policy.

Compliance: process used to identify and to ensure accountability, visibility and compliance with the policy.

Ontario Human Rights Code

The Ontario Human Rights Code (the Code) provides for equal rights and opportunities and freedom from discrimination. The Code recognizes the dignity and worth of every person in Ontario. It applies to the areas of employment, housing, facilities and services, contracts, and membership in unions, trade or professional associations. The Code protects people from discrimination and harassment because of past, present and perceived disabilities. “Disability” covers a broad range and degree of conditions, some visible and some not visible. A disability may have been present from birth, caused by an accident, or developed over time. There are physical, mental and learning disabilities, mental disorders, hearing or vision disabilities, epilepsy, mental health disabilities and addictions, environmental sensitivities, and other conditions.

What does this mean?

In broad terms, at work, employees with disabilities are entitled to the same opportunities and benefits as people without disabilities. In some cases, they may need special arrangements or “accommodations” so they can do their job duties. Customers, clients and tenants with disabilities also have the right to equal treatment and equal access to facilities and services. For example, the Code protects a person who faces discrimination because she is a recovered alcoholic. So is a person whose condition does not limit their workplace abilities, but who is believed to be at greater risk of being able to do less in the future. More information can be found at the OHRC website at

<http://www.ohrc.on.ca/en> <http://www.ohrc.on.ca/en/policy-and-guidelines-disability-and-duty-accommodate>